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9 Attorneys for Secured Creditors,  
10 U.S. Bank Trust National Association as Trustee of the Lodge Series III Trust,  
11 U.S. Bank Trust National Association as Trustee of the Chalet Series III Trust,  
12 U.S. Bank Trust National Association as Trustee of the Bungalow Series IV Trust, and  
13 U.S. Bank Trust National Association as Trustee of the Bungalow Series F Trust

14 UNITED STATES BANKRUPTCY COURT  
15  
16 DISTRICT OF NEVADA – LAS VEGAS DIVISION

17 In Re:

18 MELANIE SCHULTE and  
19 WILLIAM SCHULTE,

20 2704 SATTLEY LLC,  
21 HOT ENDEAVOR LLC,  
22 1341 MINUET LLC,  
23 1708 PLATO PICO LLC,  
24 2228 WARM WALNUT LLC,  
25 9425 VALLEY HILLS LLC,  
26 9500 ASPEN GLOW LLC,  
27 5218 MISTY MORNING LLC,  
28 CHERISH LLC,  
SABRECO INC.,  
KEEP SAFE LLC,

Debtors.

Case No.: 09-29123-mkn

Chapter 11

Jointly Administered with:

09-27238-BAM  
09-27909-BAM  
09-27910-BAM  
09-27911-BAM  
09-27912-BAM  
09-27913-BAM  
09-27914-BAM  
09-27916-BAM  
09-28513-BAM  
09-31584-BAM  
09-31585-BAM

**NOTICE OF HEARING ON MOTION TO  
CLARIFY PLAN TREATMENT  
REGARDING VARIOUS REAL  
PROPERTIES**

**Hearing Date: June 23, 2021**

**Hearing Time: 9:30 a.m.**

1           **NOTICE IS HEREBY GIVEN** that a Motion to Clarify Plan Treatment Regarding  
 2 Various Real Properties was filed on May 21, 2021 by Secured Creditors, U.S. Bank Trust  
 3 National Association as Trustee of the Lodge Series III Trust, U.S. Bank Trust National  
 4 Association as Trustee of the Chalet Series III Trust, U.S. Bank Trust National Association as  
 5 Trustee of the Bungalow Series IV Trust, and U.S. Bank Trust National Association as  
 6 Trustee of the Bungalow Series F Trust (collectively, “Secured Creditors”), creditors in this  
 7 matter. The Motion seeks the following relief: enter an Order clarifying the treatment of  
 8 Secured Creditors’ claims in Debtors’ confirmed plan and specifically confirming that the  
 9 plan did not eliminate the requirement that Debtors make escrow payments to Secured  
 10 Creditors. Any opposition must be filed pursuant to Local Rule 9014(d)(1).

11           **NOTICE IS FURTHER GIVEN** that if you do not want the court to grant the relief  
 12 sought in the Motion, or if you want the court to consider your views on the Motion, then you  
 13 must file an opposition with the court, and serve a copy on the person making the Motion no  
 14 later than 14 days preceding the hearing date for the motion, unless an exception applies (see  
 15 Local Rule 9014(d)(3)). The opposition must state your position, set forth all relevant facts  
 16 and legal authority, and be supported by affidavits or declarations that conform to Local Rule  
 17 9014(c).

18  
 19 If you object to the relief requested, you *must* file a **WRITTEN** response to this  
 20 pleading with the court. You must also serve your written response on the person  
 21 who sent you this notice. If you do not file a written response with the court, or if  
 22 you do not serve your written response on the person who sent you this notice,  
 23 then:

- 24 • The court may *refuse to allow you to speak* at the scheduled hearing; and
- 25 • The court may *rule against you* without formally calling the matter at the hearing

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1           **NOTICE IS FURTHER GIVEN** that the hearing on the said Motion will be held  
2 before a United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas  
3 Boulevard South. Bankruptcy Courtroom Number 2, Las Vegas, Nevada 89101 on June 23,  
4 2021 at the hour of 9:30 a.m.

5       DATED: May 21, 2021

GHIDOTTI | BERGER LLP

6                               By: /s/ Regina A. Habermas, Esq.  
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